

REMARKS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested.

Claims 1-18, 20, and 21 are currently pending. No claims have been amended herewith.

In the outstanding Office Action, Claims 1-18, 20, and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over European Patent Application No. EP 0797338A2 to Tahtinen et al. (hereinafter “the ‘338 application”) in view of U.S. Patent No. 6,219,045 to Leahy et al. (hereinafter “the ‘045 patent”).

Applicants wish to thank the Examiner for the interview granted Applicant’s representative on October 27, 2005, at which time Claim 1 and arguments in support of patentability were discussed. In particular, Applicant’s representative presented arguments that the ‘338 application and the ‘045 patent fail to disclose imparting virtual mobile telephones to avatars in a shared virtual space. However, no agreement was reached, pending the Examiner’s further consideration of the claims upon formal submission of a response to the outstanding Office Action.

Claim 1 is directed to a conversation support system for supporting a plurality of users in having a virtual conversation in a shared virtual space built and provided on a computer network, comprising: (1) enrolling means for enrolling an avatar of a logged-in user into the shared virtual space; (2) imparting means for imparting a virtual mobile telephone to each avatar in the shared virtual space, the virtual mobile telephone being usable within the shared virtual space; (3) determination means for determining, in response to a call for a virtual mobile telephone, whether a calling party originated the call from a telephone in the shared virtual space, from a telephone in another virtual space, or from a telephone in a real world;

and (4) connecting means for executing connection processing in accordance with the determination made by the determination means.

Regarding the rejection of Claim 1, the Office Action asserts that the '045 patent discloses everything in Claim 1 with the exception of the determination and connecting means, and relies on the '338 application to remedy those deficiencies.

The '045 patent is directed to a three-dimensional graphical, multi-user, interactive virtual world system in which a plurality of users can interact with each other through respective avatars that represent each of the users in the virtual space. However, Applicants respectfully submit that the '045 patent fails to disclose imparting means for imparting a virtual mobile telephone to each avatar in the shared virtual space, as recited in Claim 1. In this regard, Applicants submit that the passage in the '045 patent cited by the Office Action (column 3, lines 4-34) describes a virtual environment, but is silent regarding virtual mobile telephones. Moreover, as admitted in the Office Action, the '045 patent fails to disclose determination means for determining, in response to a call to a virtual mobile telephone, whether a calling party originated the call from a telephone in the shared virtual space, from a telephone in another virtual space, or from a telephone in the real world, as recited in Claim 1.

The '338 application is directed to a method and apparatus for connecting a virtual-reality world and the real world for the purpose of establishing real-time telephone communications. In particular, the '338 application discloses that subscribers of a real-world telephone network can be associated with points in a virtual reality world, and that by navigating to a desired point in the space, a user can initiate a telephone call to the real-world subscriber. However, Applicants respectfully submit that the '045 patent fails to disclose imparting means for imparting a virtual mobile telephone to each avatar in the shared virtual space, as recited in Claim 1. The '338 application is silent regarding virtual mobile

telephones. Moreover, Applicants respectfully submit that the '037 patent fails to disclose the determination means for determining, in response to a call to a virtual mobile telephone, whether a calling party originated the call from a telephone in a shared virtual space, from a telephone in another virtual space, or from a telephone in the real world, as recited in Claim 1. The '338 patent is silent regarding calls between virtual mobile telephones within a virtual space and calls into a shared virtual space.

Thus, no matter how the teachings of the '045 patent and the '338 application are combined, the combination does not teach or suggest (1) imparting means for imparting a virtual mobile telephone to each avatar in a shared virtual space; and (2) determination means for determining, in response to a call to a virtual mobile telephone, whether a calling party originated the call from a telephone in the shared virtual space, a telephone in another virtual space, or from a telephone in the real world, as recited in Claim 1. Accordingly, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 1 (and dependent Claims 2-4) should be withdrawn.

Claim 8 recites limitations analogous to the limitations recited in Claim 1. Accordingly, for the reasons stated above for the patentability of Claim 1, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 8 (and dependent Claims 9-11) should be withdrawn.

Claim 5 is directed to a conversation support system for supporting a plurality of users in having a virtual conversation in a shared virtual space built and provided on a computer network, comprising, *inter alia*: (1) enrolling means for enrolling an avatar of a logged-in user into the shared virtual space; (2) imparting means for imparting a virtual public telephone usable by any enrolled avatar to the shared virtual space at a predetermined place; (3) determination means for determining, in response to a call to the virtual public telephone,

whether a calling party originated the call from a telephone in the shared virtual space, from a telephone in another virtual space, or from a telephone in the real world.

Applicants respectfully submit that the '045 patent fails to disclose imparting means for imparting a virtual public telephone usable by any enrolled avatar to the shared virtual space at a predetermined place. The '045 patent is silent regarding any virtual public telephone in a shared virtual space. Further, as admitted in the Office Action, the '045 patent fails to disclose the determination means recited in Claim 5.

The '338 application also fails to disclose imparting a virtual public telephone usable by any enrolled avatar in a shared virtual space, as well as the determination means recited in Claim 5.

Thus, no matter how the teachings of the '045 patent and '338 application are combined, the combination does not teach or suggest the imparting means and the determination means recited in Claim 5. Accordingly, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 5 (and dependent Claims 6 and 7) should be withdrawn.

Claims 12 and 18 recite limitations analogous to the limitations recited in Claim 5. Accordingly, for the reasons stated above for the patentability of Claim 5, Applicants respectfully submit that the rejections of Claim 12 (and dependent Claims 13 and 14) and Claim 18 should be withdrawn.

Claim 15 is directed to a conversation support method for supporting an activity of an avatar in a shared virtual space built and provided on a computer network, comprising: (1) receiving a request for sending a message from the avatar; (2) determining whether a destination of the message exists in the real world; and (3) executing connection processing in accordance with the determination made by the determining step.

Applicants respectfully submit that no matter how the teachings of the '045 patent and the '338 application are combined, the combination does not teach or suggest (1) receiving a request for sending a message from an avatar; and (2) determining whether a destination of the message exists in the real world, as recited in Claim 15. Moreover, the '045 patent and the '338 application, taken either singly or in proper combination, fail to disclose determining whether a destination of the message, which was requested to be sent by an avatar, exists in the real world, as recited in Claim 15. Accordingly, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and the rejection of Claim 15 (and dependent Claim 16) should be withdrawn.

Claim 20 recites limitations analogous to the limitations recited in Claim 15. Accordingly, for the reasons stated above for the patentability in Claim 15, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 20 should be withdrawn.

Claim 17 is directed to a conversation support method for supporting an activity of an avatar in a shared virtual space built and provided on a computer network, comprising: (1) receiving a request for sending a message from a telephone of a user in the real world to a public telephone network in the real world, wherein the user is not logged into the shared virtual space; (2) determining whether a destination of the message exists in the shared virtual space; and (3) if the determining step determines that the destination of the message exists in the shared virtual space, sending the message to the avatar.

Applicants respectfully submit that, no matter how the teachings of the '045 patent and the '338 application are combined, the combination does not teach or suggest determining whether a destination of a message, wherein the request for sending the message originated from a telephone of a user in the real world, exists in a shared virtual space. The '045 patent and the '338 application do not disclose determining whether a destination of a message exists

in a shared virtual space. Accordingly, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 17 should be withdrawn.

Claim 21 recites limitations analogous to the limitations recited in Claim 17. Accordingly, for the reasons stated above for the patentability of Claim 17, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 21 should be withdrawn.

Thus, it is respectfully submitted that independent Claims 1, 5, 8, 12, 15, 17, 18, 20, and 21 (and all associated dependent claims) patentably define over any proper combination of the '045 patent and '338 application.

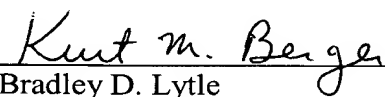
Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The present application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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